

## commentletters - Comments on proposed ocean plan amendments

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**From:** "Griffin, Charles (Skip)" <CAGriffin@pbsj.com>  
**To:** <commentletters@waterboards.ca.gov.>  
**Date:** 7/26/2007 8:22 AM  
**Subject:** Comments on proposed ocean plan amendments  
**CC:** "Andy Shea" <andy.shea@acciona.com>, "Griffin, Charles (Skip)" <CAGriffin@pbsj.com>, <nvoutchkov@poseidon1.com>, "Peter MacLaggan" <pmaclaggan@poseidon1.com>

6/26/07 Scoping Mtg.  
 CA Ocean Plan Amend.  
 Deadline: 7/27/07 Noon

July 26, 2007

State Water Resources Control Board  
 Division of Water Quality  
 1001 I Street  
 Sacramento, CA 95814



Attn: Song Her, Clerk of the Board, Executive Office

**Re: Support for Item 10, Alternative 1, No Action, California Ocean Plan Amendment**

On behalf of PBS&J, I am writing you regarding the Ocean Plan Amendment, "Issue 10. Desalination Facilities and Brine Disposal. PBS&J is a national engineering and environmental science firm of 4,000 staff in 75 offices throughout the country. Importantly, a large amount of our business revolves around the preparations of CEQA / NEPA documentation and related environmental activities focused on protecting the marine environment. We routinely deal with both surface and sub surface coastal issues and desalination. We design life support systems of aquariums around the world and are very familiar with the salinity needs of many species.

Clearly, ocean water desalination is a recognized part of California's future water portfolio. Our ability to utilize new water supplies for urban use through desalination will provide much needed security for our drinking water supply, protection for agricultural needs and will safeguard our natural resources. For these reasons, the development of a new source of water is an urgent necessity.

In order to provide the water community an opportunity to research and review the potential of ocean water desalination, we ask that Alternative 1. No Action, be selected by the Board, so as to prevent any artificial standard (percentage of natural background) from impeding the continued design of desalination plants where feasible and appropriate to meet the needs of our current and future generations.

PBS&J has already contacted over 75 marine scientist and biologists to get their specific ideas on the critical parameters for protecting marine life and discharging brine from desalination plants back into the ocean for a project we are now designing. That project is clearly focused on protecting the marine environment.. These scientists and biologists were representatives of such prestigious agencies/institutions as:

- NOAA - Monterey Bay National Marine Sanctuary
- Monterey Bay Aquarium Research Institute (MBARI)
- The David and Julie Packard Foundation
- The Stanford University Hopkins Marine Institute.

There is no question that salinity tolerance the marine environment can handle is very site-specific and clearly depends of the type of species in the vicinity of the discharge and the type of discharge. Establishing a "blanket" state-wide salinity limit would not provide an additional protection to the aquatic environment beyond

that provided by the existing toxicity limits. More importantly, it will only hinder the implementation of desalination projects and increase their costs dramatically.

In conclusion, there is an old saying that seems appropriate which is: "If it ain't broke, don't fix it." The existing Ocean Plan already has acute and chronic toxicity water quality objectives, which address effect of concentrate on aquatic environment.

If we can be of any assistance to you, or provide any addition information regarding this issue, please contact us at your convenience.

Sincerely,

Charles A. "Skip" Griffin, Jr., P.E., BCEE  
Senior Vice President

**PBS&J**

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